

**United States Bankruptcy Court**  
**Northern District of Illinois, Eastern Division**

IN RE: Ronnie Rush	)	Chapter 13
	)	Case No. 17 B 38336
Debtor(s)	)	Judge Deborah L. Thorne

**Notice of Motion**

Ronnie Rush  
8715 S. Marshfield  
Chicago, IL 60620

Debtor Attorney: David M Siegel  
via Clerk's ECF noticing procedures

On March 07, 2018 at 10:30 am, I will appear at the location listed to the right, and present this motion.

> Dirksen Federal Building  
> 219 South Dearborn  
> Courtroom 613  
> Chicago, IL 60604

I certify under penalty of perjury that this office caused a copy of this notice to be delivered to the persons named above by U.S. mail or by the methods indicated on or before Wednesday, February 28, 2018.

/s/ MARILYN O. MARSHALL  
MARILYN O. MARSHALL, TRUSTEE

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**Motion to Dismiss Case For Unreasonable Delay**

Comes now Marilyn O. Marshall, Standing Trustee, and requests that this case be dismissed, as Debtor(s) failed to file the required documents pursuant to 11 USC §521, §1307, §349, and Rule 3015, and in support thereof states the following:

1. Debtor(s) filed for Chapter 13 on 12/29/2017.
2. The debtor(s) have failed to provide copies of all payment advices or other evidence of payment received within 60 days before the date of filing the petition.
3. The debtor(s) have failed to maintain payments to the Trustee's office as required under 11 U.S.C. §1326.
4. The debtor(s) have failed to resolve the pending objection(s) to the plan.
5. The stay has been extended in this case and the debtor has failed to maintain timely plan payments.
6. The debtor's plan fails to list the amendments made, is inconsistent, and fails to properly list provisions.
7. The debtor's failure to confirm a plan in a timely manner constitutes unreasonable delay.

WHEREFORE, the Trustee prays that this case be dismissed, and for any and all other relief this court deems just and proper.

Office of the Chapter 13 Trustee  
224 S Michigan Ave  
Ste 800  
Chicago, IL 60604  
(312) 431-1300

/s/ MARILYN O. MARSHALL  
MARILYN O. MARSHALL, TRUSTEE